

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

CASE 23-M-0040 -- In the Matter of Utility Customer Service Performance.

2022 Customer Service Performance Report

Office of Consumer Services
Consumer Advocacy Section
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INTRODUCTION

This report summarizes the New York State electric, gas, and water utilities' customer service performance measures in calendar year 2022. This report addresses the performance of the following utilities, collectively referred as the "Companies" or "Utilities": Central Hudson Gas and Electric Corporation (Central Hudson); Consolidated Edison Company of New York, Inc. (Con Edison); Corning Natural Gas Corporation (Corning); KeySpan Gas East Corporation d/b/a National Grid (KEDLI); The Brooklyn Union Gas Company d/b/a National Grid NY (KEDNY); Liberty Utilities (New York Water) Corporation (Liberty Water); Liberty Utilities (St. Lawrence Gas) Corporation (Liberty SLG); National Fuel Gas Distribution Corporation (NFG); Niagara Mohawk Power Corporation d/b/a National Grid (NMPC); New York State Electric & Gas Corporation (NYSEG); Rochester Gas & Electric Corporation (RG&E); Orange and Rockland Utilities, Inc. (O&R); and Veolia Water New York Inc. (Veolia), formally known as Suez Water New York Inc. and Suez Water Westchester Inc.¹ Each utility submits performance reports for the prior year, including any incurred negative revenue adjustments (NRAs) for measures as negotiated in individual utility rate case proceedings.

In addition to the required annual Customer Service Performance Indicator (CSPI) reports, a subset of the utilities² file monthly CSPI reports, which are used to track and monitor a utilities' progress and performance on various metrics throughout the calendar year.³ Reporting commenced in April 1992, when the Commission directed the major electric and gas utilities with

¹ PSEG Long Island (PSEG LI) is the Service Provider for the Long Island Power Authority (LIPA). LIPA and PSEG LI are largely excluded from Public Service Commission (PSC) jurisdiction pursuant to Public Authorities Law (PAL) §1020-s, however, LIPA and PSEG LI are subject to review by the Department of Public Service pursuant to Public Service Law §3-b. LIPA and PSEG LI must also comply with Art. 2 of the PSL. While PSEG LI is not subject to the Commission's orders regard these metrics, their performance data is provided in this report.

² Case 15-M-0566, In the Matter of Revisions to Customer Service Performance Indicators Applicable to Gas and Electric Corporations, Order Adopting Revisions to Customer Service Reporting Metrics (issued August 4, 2017) (Metrics Order), p. 2. The utilities that submit monthly CSPI reports are: Central Hudson, Con Edison, KEDLI, KEDNY, NMPC, NFG, NYSEG, O&R, and RG&E.

³ Metrics Order, p. 21.

greater than 25,000 customers to compile and file monthly CSPI reports that detail a series of standardized measures of customer service performance.⁴ The CSPI reports have allowed staff of the Department of Public Service (Staff) to review and analyze trends in customer service levels when compared from utility to utility and year over year, which aids in designing and adjusting customer service performance mechanisms in rate cases.

Staff's audit findings have demonstrated that Corning, KEDNY, KEDLI, Liberty Water, O&R, and Veolia have satisfactorily met their standard levels of customer service performance for calendar year 2022. Over the same period, Con Edison, Liberty SLG, and NMPC have each missed one of their respective customer service targets. Con Edison failed to meet its Call Answer Rate target and incurred an NRA of \$4.00 million. Liberty SLG failed to meet its Customer Satisfaction Survey target and is assessed an NRA of \$36,000. NMPC failed to meet its Customer Satisfaction Survey target and therefore it incurred an NRA of two basis points, or approximately \$1.05 million.

Additionally, three utilities failed all of their respective calendar year 2022 customer service metric targets: Central Hudson, NYSEG, and RG&E, and together incurred total NRAs of \$17.49 million. Central Hudson failed its Call Answer Rate, Customer Satisfaction Survey, and PSC Complaint Rate metrics, and it incurred a combined NRA of more than \$2.87 million. Central Hudson attributed its failure to meet its metrics to the roll out of its new billing system, which began in September 2021.⁵ NYSEG and RG&E failed their respective Call Answer Rate, Customer Satisfaction Survey, Percent of Estimated Bills, and PSC Complaint Rate metrics. NYSEG and RG&E have therefore incurred total NRAs of \$8.72 million and \$5.90 million, respectively. NYSEG and RG&E stated that call center staffing issues was a root cause of the metric failures, however, they report that they have seen improvements in call center employee retention and hiring since expanding the opportunities for telecommuting. NYSEG and RG&E also stated that their meter reading staff has drastically decreased since they announced the pending

⁴ Case 91-M-0500, Proceeding on Motion of the Commission as to the Desirability of Establishing Customer Service Standards Applicable to Gas, Electric, Water and Steam Corporations, Order Directing Utilities to Supply Service Data (issued January 16, 1992).

⁵ Matter 22-00666, In the Matter of Staff's Investigation into Central Hudson's Customer Information System Implementation and Resulting Billing Errors.

implementation of advanced meter infrastructure (AMI), but the Companies are currently hiring more meter readers to address their metric failures.

Table 1 – 2022 Targets and Performance for Utilities that Incurred NRAs

Utility	Metric	Target	Actual Performance	NRA Amount
Central Hudson	Call Answer Rate	67.0%	66.5%	3 Basis Points (BP) / \$373,872
	Customer Satisfaction Survey	89.0%	67.2%	10 BP / \$1.25 million
	PSC Complaint Rate	1.0	11.3	10 BP / \$1.25 million
	Central Hudson Total			23 BP/ \$2.87 million
Con Edison	Call Answer Rate	66.6%	62.5%	\$4.00 million
Liberty SLG	Customer Satisfaction Survey	86%	81%	\$36,000
NMPC	Customer Satisfaction Survey	82.0%	81.5%	2 BP / \$1.05 million
NYSEG	Call Answer Rate	70.00%	43.23%	\$1.72 million
	Customer Satisfaction Survey	89.5%	84.7%	\$3.20 million
	Estimated Bills	6.76%	12.60%	\$1.40 million
	PSC Complaint Rate	1.00	1.49	\$2.40 million
	NYSEG Total			\$8.72 million
RG&E	Call Answer Rate	70.00%	41.61%	\$1.00 million
	Customer Satisfaction Survey	88.0%	80.4%	\$2.00 million
	Estimated Bills	15.65%	27.90%	\$0.90 million
	PSC Complaint Rate	1.00	3.37	\$2.00 million
	RG&E Total			\$5.90 million

STANDARD OF REVIEW

As utilities are monopoly delivery providers, there is little direct financial pressure to provide quality customer service. Staff performs a variety of activities throughout the year to monitor the quality of customer service provided by the Utilities and to help ensure the fair and appropriate treatment of utility customers. Staff's annual audits ensure the accuracy of the Utilities' reported data and uncover any potential shortcomings or improvements that should be addressed in utility processes or procedures. These audits also confirm if an NRA for poor customer service quality should be assessed to a utility, or if the correct amount is assessed. The treatment of an NRA to be assessed to a utility is specified in each utility's rate plan and is generally deferred until that utility files for its next rate case. These NRAs offset rate increases for some future period for the benefit of customers.

Staff has audited the reported data for customer service performance measures in calendar year 2022 submitted by Central Hudson, Con Edison, Coning, KEDLI, KEDNY, NFG, NMPC, NYSEG, Liberty Water, O&R, RG&E, Liberty SLG, and Veolia, through in-person site visits, the replication of granular data, and the verification of the calculations for the calendar year 2022 utility performance. During its review of calendar year 2022 performance, Staff submitted multiple interrogatories (IRs) to the utilities for detailed data on the metrics, the responses to which Staff compared, recalculated, verified, and utilized to confirm the reported performances for calendar year 2022. Staff held virtual meetings and conducted in-person site visits to the Utilities' operations centers to further discuss the processes, procedures, and conduct real-time verification of the figures provided in the Utilities' various reports. The virtual meetings were held either via Webex or Microsoft Teams, which allowed the utility in question to screenshare to demonstrate to Staff their granular data and how they query their systems when compiling the metric reports. Staff brought any discrepancies it discovered during this audit to the respective utility's attention for remediation and Staff subsequently reverified any updated data provided by a utility.

2021 Customer Service Performance Report Follow-Up

In June 2022, Staff filed its 2021 Annual Customer Service Performance Report (2021 Report), which provided an overview of Staff's audit into the utilities' practices, procedures, and performance in 2021. The 2021 Report provided 13 detailed recommendations to various utilities on methods of potentially improving their processes, which are shown in Appendix A of

this report. Staff made five general recommendations to all the utilities providing ways to improve various procedures and policies, from vendor and staffing reviews to arrearages. Staff also made utility-specific recommendations to Central Hudson, Con Edison, NFG, Liberty Water, Liberty SLG, and Veolia resulting from Staff's audit of calendar year 2021 performance. In a follow-up meeting regarding the 2021 Report, Staff informed the Utilities that while the Commission has not issued a directive to implement Staff's audit recommendations, Staff's 2022 Report would contain details on the policy or procedural changes the Utilities made resulting from the recommendations in the 2021 Report. Staff will identify any notable deviations from the 2021 Report recommendations in the following sections.

2022 CUSTOMER SERVICE PERFORMANCE

The following sections describe each utility's customer service performance mechanisms' annual performance for calendar year 2022 and incurred NRAs. This section includes the following utilities: Central Hudson; Con Edison; Corning; KEDLI; KEDNY; NFG, NMPC; NYSEG; Liberty Water; O&R; RG&E; Liberty SLG; Veolia; and PSEG LI. Appendix C presents a breakdown of the service quality metrics effective at each of the utilities and their respective applicable positive revenue adjustments (PRAs) and/or NRAs.

In recent years, the Commission has adopted rate plans for several of the Utilities that shift the values for the PRAs/NRAs from whole fixed dollar amounts to basis points that are adjusted from year to year within their respective rate plans. Establishing customer service performance mechanisms with basis points allows for the incentive amounts earned or incurred to adjust over time, rather than remaining a stagnant dollar value. A basis point for determining an NRA is generally calculated by measuring the change of one hundredth of one percent of the equity portion of a utility's rate base.⁶ Therefore, the PRA/NRA basis point amounts vary according to

⁶ A basis point is equivalent to one hundredth of one percent of the equity portion of a utility's rate base grossed up for income taxes and a retention factor for various revenue-based costs included in a utility's revenue requirement (e.g., revenue taxes and uncollectibles). The equity portion of a utility's rate base is calculated by multiplying the utility's rate base by its equity ratio.

the relative size and specifics of each utility.⁷ While most utilities have fully converted from dollar values to basis points, Con Edison, KEDLI, KEDNY, Liberty SLG, NYSEG, and RG&E have not yet transitioned their NRAs to basis point values. To remain consistent across all utilities and to ensure that the customer service revenue adjustment values provide a meaningful incentive over time, Staff recommends that each of the remaining Utilities with customer service NRAs and PRAs stated solely in dollar-values include a proposal to convert to basis points in its next rate case filing (**Staff Recommendation No. 1**).

PSC Complaint Rate

The Department of Public Service enters complaints received on behalf of the PSC into the Quick Resolution System (QRS). If a utility is unable to adequately address a customer's initial QRS complaint, the Department escalates the QRS complaint to a Standard Resolution System (SRS) complaint. Staff uses these escalated SRS complaints to determine each utility's PSC Complaint Rate. PSC Complaint Rates are not self-reported by the Utilities.

The PSC Complaint Rate targets factor in the number of customers a utility serves. For utilities, the relevant rate orders set the PSC Complaint Rate target as the number of SRS complaints per 100,000 customers. If a utility's customer population is less than 100,000 customers the relevant rate order sets a Complaint Metric target differently, so as to provide a

⁷ See, Cases 21-G-0394, et al., Corning Natural Gas Corporation – Gas Rates, Order Adopting Terms of Joint Proposal, Establishing Rate Plan and Approving Merger (issued June 16, 2022), Attachment A (Joint Proposal), p. 26; Case 20-W-0102, American Water Works Company, Inc.; New York American Water Company, Inc.; and Liberty Utilities (Eastern Water Holdings) Corp., Order Adopting Terms of Joint Proposal, Approving Stock Purchase Agreement and Long-Term Indebtedness, with Additional Requirements (issued December 16, 2021), p. 57 and Exhibit A (Joint Proposal), Exhibit 2 to Joint Proposal; Cases 20-E-0380, et al., Niagara Mohawk Power Corporation d/b/a National Grid – Electric and Gas Rates, Order Adopting Terms of Joint Proposal, Establishing Rate Plans and Reporting Requirements (issued January 20, 2022), Attachment 1 (Joint Proposal), Appendix 15; Cases 21-G-0073, et al., Orange and Rockland Utilities, Inc. – Electric and Gas Rates, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plans, with Additional Requirements (issued April 14, 2022), Attachment A (Joint Proposal), Appendix 15; Case 21-W-0338, Joint Petition of Veolia Environment S.A., Veolia North America, Inc., SUEZ S.A., and SUEZ Water New York Inc. for Approval Pursuant to Section 89-h of the Public Service Law of the Acquisition of SUEZ S.A. by Veolia Environment S.A., Order Adopting Joint Proposal (issued December 16, 2021), Joint Proposal, p. 8.

reasonable incentive for the utility. Corning's target, for example, requires that it receive less than three SRS complaints in a year.⁸

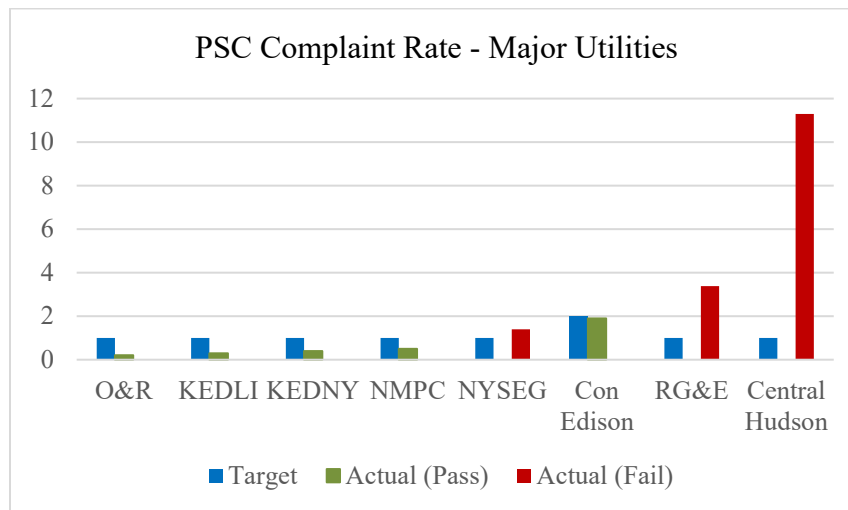
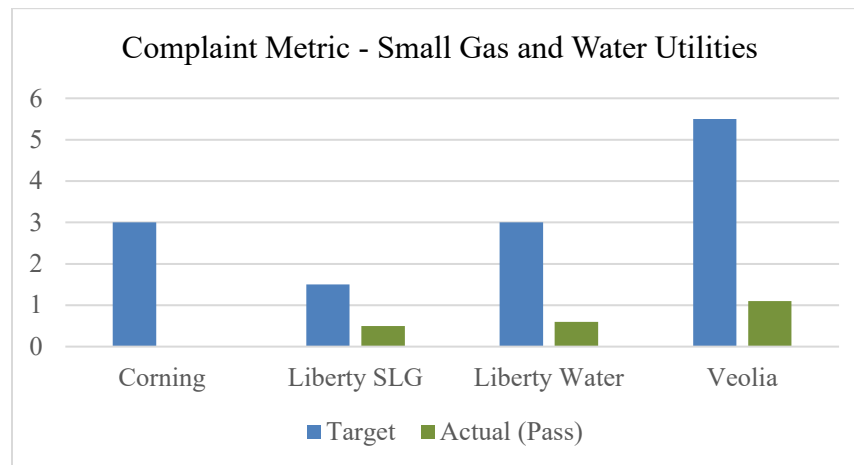
Central Hudson's PSC Complaint Rate was 11.30 against a target of 1.00 or less, which resulted in an NRA of ten basis points, or \$1.25 million.⁹ During audit discussions with Staff, Central Hudson attributed the increase in escalated complaints to several factors related to its customer billing system conversion that began in September 2021, including higher call volumes due to the additional media attention and a high level of attrition in its contact center. Central Hudson stated it is currently hiring to address the insufficient staffing and to correct the declines in performance experienced in calendar years 2021 and 2022.

For calendar year 2022, NYSEG's PSC Complaint Rate was 1.49 per 100,000 customers, compared to its target of 1.00 or less, while RG&E's performance was 3.37 compared to a target of 1.00 or less. During the site visit, NYSEG and RG&E detailed their procedures for handling customer inquiries and identified a backlog of complaints, as the Companies did not have enough Complaint Department staff to sufficiently handle the volume of customer complaints being filed. The Companies stated that this backlog resulted in slower response times, which ultimately led to their inability to meet the performance targets. NYSEG and RG&E should closely monitor and manage their staffing levels for all areas of customer service, including their Complaint Department, to ensure personnel are assigned to appropriately and adequately address customer service performance levels (**Staff Recommendation 16**). Therefore, due to the utilities' inability to meet their respective PSC Complaint Rate targets in calendar year 2022, NYSEG and RG&E incurred NRAs of \$2.40 million and \$2.00 million, respectively.

As shown in Table 2, Con Edison, KEDLI, KEDNY, NMPC, and O&R, have satisfactorily met the designated targets under their respective PSC Complaint Rate metrics and have not incurred any NRAs for this metric. As shown in Table 3, Corning, Liberty SLG, Liberty Water, and Veolia each met their respective Complaint Metric targets.

⁸ Cases 21-G-0394, et al., supra, Order Adopting Terms of Joint Proposal, Establishing Rate Plan and Approving Merger (issued June 16, 2022), Attachment A (Joint Proposal), p. 26.

⁹ Cases 20-E-0428, et al., Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Central Hudson Gas & Electric Corporation for Electric Service, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan, (issued November 18, 2021), Attachment 1 (Joint Proposal), pp. 59-60.

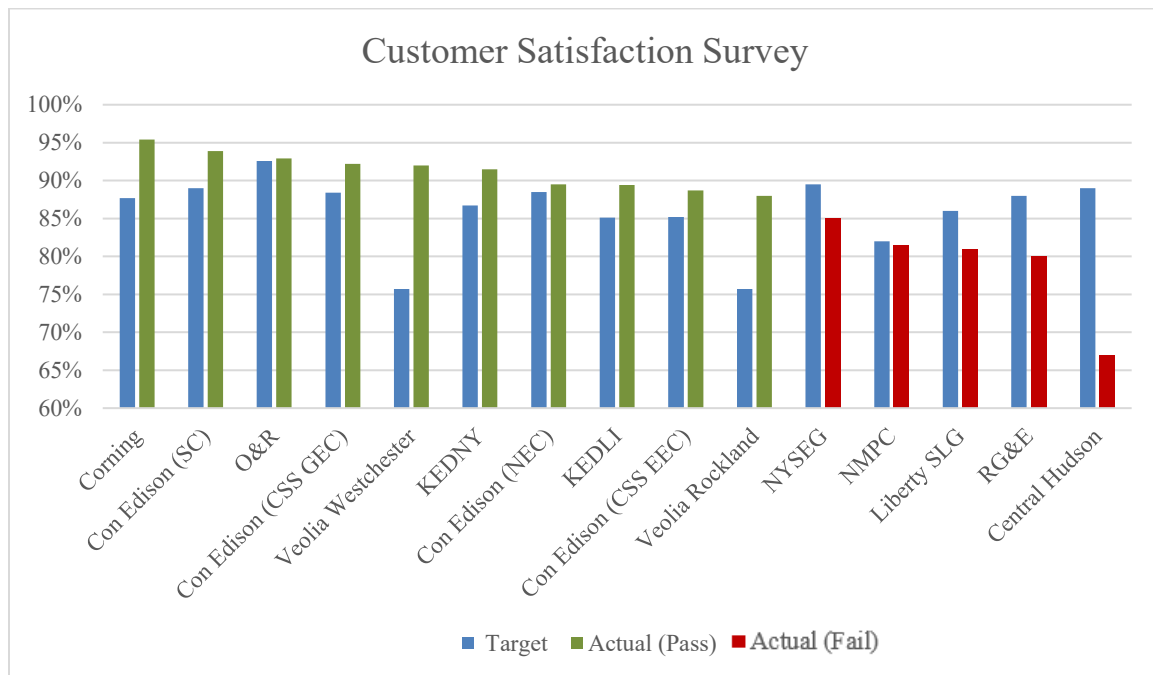
Table 2 – 2022 Large Utilities PSC Complaint Rate ResultsTable 3 – 2022 Small Gas and Water Utilities Complaint Metric Results¹⁰

Customer Satisfaction Survey

Each utility conducts a customer satisfaction survey(s) that is either administered by the utility or a third-party contracted vendor. The Commission establishes targets in each utility's respective rate plan. The utilities' calendar year 2022 performance and their associated target levels are shown in Table 4. In calendar year 2022, Central Hudson, Liberty SLG, NMPC, NYSEG, and RG&E failed to meet their respective targets for the Customer Satisfaction Survey, and each utility incurred an NRA.

¹⁰ Corning had zero SRS complaints in 2022.

Table 4 – 2022 Residential Customer Satisfaction Survey Results



The Commission adopted Central Hudson's 89.0% minimum target in 2020;¹¹ however, Central Hudson's performance for calendar year 2022 was 67.2%. Staff's audit verified the results provided by the utility and confirmed that Central Hudson incurred an NRA of ten basis points, or \$1.25 million, for failing to meet the 2022 Customer Satisfaction Survey target. The utility attributes the decline to the increased media attention it received due to the billing investigation.

Con Edison's rate plan requires its Customer Satisfaction Survey to have multiple survey components to measure customer satisfaction. The surveys are: the Customer Satisfaction Survey of Electric Emergency Calls (Con Edison (CSS EEC)); the Customer Satisfaction of Gas Emergency Calls (Con Edison (CSS GEC)); the Customer Satisfaction Survey of Non-Emergency Calls (Con Edison (CSS NEC)); and the Customer Satisfaction of Service Center Visitors (Con

¹¹ Cases 20-E-0428, *et al.*, *supra*, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan, (issued November 18, 2021), Attachment 1 (Joint Proposal), pp. 59-60.

Edison (CSS SC)).¹² Con Edison met all of its Customer Satisfaction Survey performance targets in calendar year 2022.

Liberty SLG failed to meet its Customer Satisfaction Survey target of 86.0% in calendar year 2022 with actual performance of 81.0%. Liberty SLG therefore incurred an NRA of \$36,000. At the beginning of 2023, Liberty SLG began working with a new survey vendor to align Liberty SLG with the rest of Liberty Utilities' operating entities and to improve its performance. Liberty SLG stated one of the primary reasons for switching vendors was low response rates under the previous vendor, which the Company states contributed to it failing the Customer Satisfaction Survey metric in 2022. Liberty SLG informed Staff the vendor provided fewer responses than the number Liberty SLG needed to determine a viable level of customer satisfaction. Staff recommends the Company closely monitor its transition to the new vendor to ensure the requested level of survey responses are being completed and stay in close communication with the new vendor to proactively ensure that the transition to the new vendor is a success. Additionally, the Company should continue to reach out to customers who have provided an unsatisfactory survey response to understand the root cause of the customers' concerns and develop improvement opportunities (**Staff Recommendation 14**).

NMPC's performance for its Customer Satisfaction Survey in calendar year 2022 was 81.5%, 0.5% below its target performance of 82.0%, which resulted in an NRA of \$1.05 million. When Staff requested additional explanation from the Companies of why it failed this metric in 2022, the Company stated that its performance was mainly attributed to higher bills and increased commodity costs, specifically in the eastern part of its service territory. The Company conducted extensive outreach campaigns to inform customers of impending high bills; however, the Companies stated that the levels of increased high bills still affected the Company's Customer Satisfaction Survey performance.

NYSEG's Customer Satisfaction Survey performance in calendar year 2022 was 84.7%, which is 4.8% lower than its target performance of 89.5%. RG&E reported its calendar year 2022 performance for the Customer Satisfaction Survey metric as 80.4%, which is 7.6% less

¹² Cases 19-E-0065, et al., Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Consolidated Edison Company of New York, Inc. for Electric Service., Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan (issued January 16, 2020), Attachment A (Joint Proposal), Appendix 18, pp. 4-6.

than its target approved in its most recent Joint Proposal of 88.0%.¹³ In comparison to their performance in calendar year 2021, NYSEG and RG&E's performance for this metric declined by 5.9% and 10.6%, respectively. The Companies informed Staff during the site visit that they attribute their failure to meet the metrics in 2022 largely due to the lasting effects the Covid-19 pandemic has had on their business practices. The Companies state that the Covid-19 pandemic resulted in declines in staffing levels and increases in the time to address customer issues, which affected customers' satisfaction with the Companies.

Veolia acquired Suez Rockland and Suez Westchester in 2021. At that time, the Commission established new customer performance metrics for the utility, including the PSC Complaint Rate and Customer Satisfaction Survey.¹⁴ Staff made a recommendation in the 2021 Report that SUEZ should conduct its survey on a monthly basis, rather than an annual basis. As the Acquisition Order specifies that Veolia shall conduct the survey annually, the Company has not yet implemented this recommendation. However, Staff continues to advocate that conducting the survey on a monthly basis allows for real-time feedback. Staff therefore recommends Veolia consider implementing its survey on a monthly basis in its currently pending rate proceeding,¹⁵ so as to prevent lags in feedback from customers on their satisfaction levels (**Staff Recommendation No. 18**).

Call Answer Rate

Utilities answer customer telephone calls either through internal call centers, reliance on outside third-party vendors, or a combination of both methods. The Call Answer Rate metric examines the percent of customers who request to speak with a customer service representative (CSR) and are answered by a CSR within 30 seconds.¹⁶ The Commission permitted

¹³ Cases 19-E-0378, et al., Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of New York State Electric & Gas Corporation for Electric Service., Order Approving Electric and Gas Rate Plans in Accord with Joint Proposal, with Modifications (issued November 19, 2020), Attachment 1 (Joint Proposal), Appendix P.

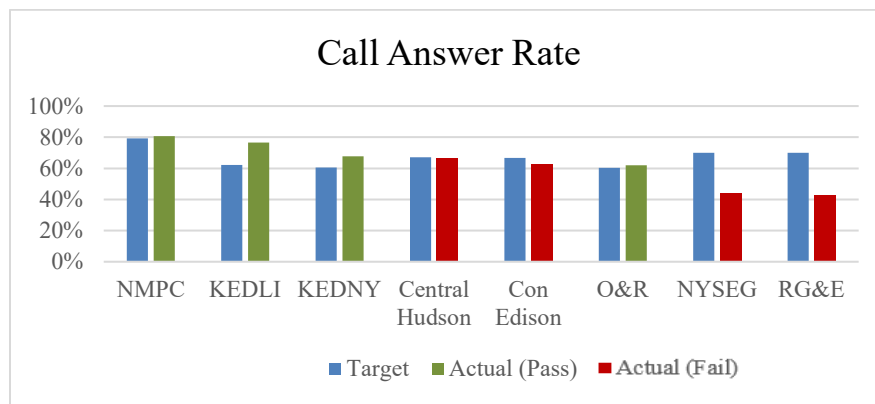
¹⁴ Case 21-W-0338, supra, Order Adopting Joint Proposal (issued December 16, 2021), Joint Proposal, pp. 7-8.

¹⁵ Case 23-W-0111, Proceeding on Motion of the Commission as to the Rates, Charges, Rules and Regulations of Veolia Water New York, Inc. for Water Service.

¹⁶ Metrics Order, Appendix, p. 5.

the utilities, at their discretion, to choose whether to include dedicated line phone calls, provided to customers for a specific service such as electric emergency or gas emergency calls, in their respective metric formulae for the monthly CSPI reports.¹⁷ NFG, NYSEG, RG&E, and O&R exclude specific phone lines from their call answer rate metrics. NFG excludes Special Assistance Group calls from social service agencies, Public Service Commission calls for Quality Assurance, meter readings customers enter via the phone keypad, and calls made to third-party vendors for payment processing.¹⁸ NYSEG and RG&E exclude Department of Human Services dedicated calls.¹⁹ O&R excludes calls directly to the life support equipment and new business hotlines.²⁰ As shown in the Table 5, NMPC, KEDLI, KEDNY, and O&R have met or exceeded their respective 2022 Call Answer Rate performance targets, while Central Hudson, Con Edison, NYSEG and RG&E have failed to meet their respective targets.

Table 5 – 2022 Call Answer Rate Results



The majority of utilities that failed to meet their designated targets in calendar year 2022 claimed that attrition in their call centers made hiring additional CSRs challenging, which ultimately lead to declines in their ability to answer customer calls promptly. All utilities should closely monitor their performances for this metric in calendar year 2023 to ensure that they dedicate

¹⁷ Metrics Order, pp. 12-13.

¹⁸ Case 15-M-0566, supra, NFG CSPI 2023-04 Report (filed May 31, 2023).

¹⁹ Case 15-M-0566, supra, NYSEG and RGE Performance Indicator Filing April 2023 (filed May 31, 2023).

²⁰ Case 15-M-0566, supra, PIR Report April 2023 (filed May 12, 2023).

adequate resources to answering calls. Central Hudson, Con Edison, NYSEG, and RG&E should monitor their staffing levels to ensure that they assign appropriate and adequate personnel to address call answer rate performance levels (**Staff Recommendations 10, 11, and 16**). When reviewing the utilities' granular call data for calendar year 2022 performance, Staff noted several utilities had increased call hold times. Additionally, Staff reviewed customer complaints that asserted very long hold times for several utilities. Staff recommends that the utilities take measures to mitigate this issue, if they have not already done so. Specifically, Staff recommends the utilities commence tracking the speed of representatives answering customer calls, customer hold times, and abandoned customers calls for specific periods of call times, such as less than thirty seconds, less than one minute, greater than one minute, greater than two minutes, greater than five minutes, greater than ten minutes, greater than fifteen minutes, etc., for the potential implementation of future call monitoring metrics (**Staff Recommendation 8**).

Central Hudson's Call Answer Rate was 66.5% compared to its target of 67.0% for 2022, and it incurred an NRA of three basis points, or \$373,872. Central Hudson asserted that its call volume increased due to the additional media attention over the past year. Central Hudson personnel also noted a high level of attrition in the contact center began after the Company implemented its new customer billing system in September 2021. The Company stated it is currently hiring more CSRs to correct the declines in its Call Answer Rate performance seen in calendar year 2021 and calendar year 2022.

During Staff's review of the granular data supporting Con Edison's Call Answer Rate, Staff discovered that Con Edison calculated the metric results using weighted averages in calendar year 2022, which does not align with other utilities' calculation methodologies. To prevent confusion in future customer service performance audits, Staff recommends that future rate plans for all utilities detail the calculation methodologies for each of the annual Customer Service Performance Indicator metrics and that the utilities update their metric manuals accordingly (**Staff Recommendation No. 3**). This will ensure uniformity among the utilities' methodologies, as the formula will be clearly stated in each utility's rate plan.

Neither NYSEG nor RG&E met the target thresholds for their respective Call Answer Rate metrics in calendar year 2022. Both NYSEG and RG&E's performance decline towards the end of 2022. NYSEG achieved a Call Answer Rate of 43.23% in calendar year 2022, 26.77% below its target of 70.00%. RG&E achieved a Call Answer Rate of 41.61%, 28.39% less

than its target of 70.00%. As a result of their performance in calendar year 2022, NYSEG and RG&E incurred NRAs of \$1.72 million and \$1.00 million, respectively.

While NFG currently does not have NRAs associated with its Customer Service Performance metrics, Staff continues to monitor its performance. In calendar year 2022, NFG's Call Answer Rate performance was 60.6% compared to 87.0% for calendar year 2021. Staff recommends that NFG continue to monitor its performance for Call Answer Rate and conduct an analysis of its available customer service representatives to ensure adequate staffing (**Staff Recommendation No. 15**).

Adjusted Bills and Estimated Bills

An adjusted bill is a subsequent bill that has been sent to a customer after an initial bill has already been issued for that same billing period. KEDLI and KEDNY's most recent rate plan, which the Commission adopted in Cases 19-G-0309 and 19-G-0310, sets the targets for their Adjusted Bills metrics at less than 1.50% and 0.52%, respectively. KEDLI and KEDNY's performance levels in calendar year 2022 were 0.18% and 0.34%, respectively, which were below, and therefore met their respective targets.

Central Hudson, through its own internal audit, discovered a discrepancy in the data it reported for adjusted bills since the implementation of its new billing system in September 2021. Central Hudson attributed the discrepancy to a terminology issue within the billing system in counting bills, which includes all internal adjustments within a month that the Company views, instead of invoices, which are provided to customers. As a result, Central Hudson filed revised monthly reports for September 2021 through January 2023 with a lower number of adjusted bills, however the revisions do not change its incurred NRAs, as Central Hudson has no NRAs associated with adjusted bills.

Utilities issue estimated bills to customers based on estimated meter readings rather than actual meter readings. A utility relies on estimated meter readings when the utility is unable to obtain a scheduled meter reading. Some utilities, such as Central Hudson, NYSEG, and RG&E schedule reading a customer's meter every other month, and provide estimates on the alternate months. To improve meter reading levels, Companies should increase their efforts to educate customers on providing customer reads to lower estimated readings (**Staff Recommendation No. 7**).

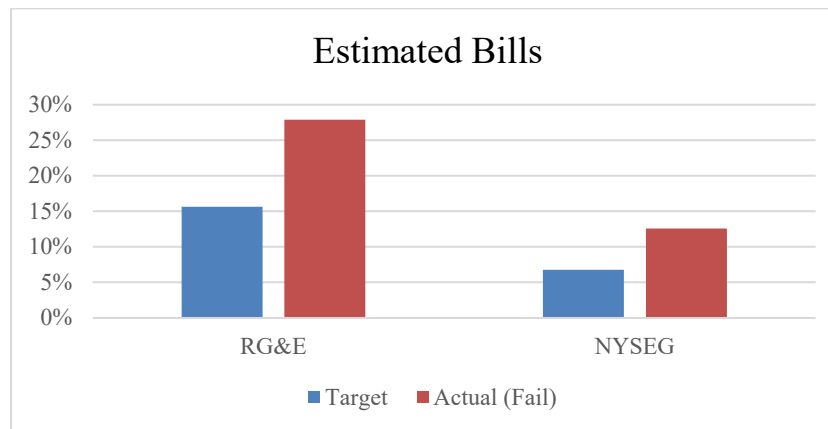
In calendar year 2022, NYSEG and RG&E failed to meet their respective targets for the Estimated Bills metric,²¹ as shown in Table 6 below. NYSEG reported an annual performance of 12.60%, which is 5.84% greater than its approved target of 6.76%, which resulted in an NRA of \$1.40 million. RG&E's calendar year 2022 estimated bill result was 27.90%, which is 12.25% greater than the designated target of 15.65% and resulted in an NRA of \$0.90 million.

NYSEG and RG&E's current rate plan provides that, if either utility fails to meet a metric for two consecutive years, the NRA amount in the second year would double.²² NYSEG and RG&E did not meet the target for the Percent of Estimated Bills in calendar years 2021 or 2022, which would result in the doubling of the NRA for 2022. However, the Companies have filed petitions to waive their Percent of Estimated Bills performances for both 2021 and 2022.²³ NYSEG and RG&E assert that their failure to meet their Percent Estimated Bills metrics resulted primarily from impacts of the Covid-19 pandemic. These petitions are still pending Commission action, so 2022 NRAs detailed within this report do not reflect the potential doubling provision NRA amounts. However, if the doubling provision is given effect, the 2022 Percent of Estimated Bills NRA would increase to \$2.80 million and \$1.80 million for NYSEG and RG&E, respectively. Thus, the doubling provision would result in NYSEG's total NRAs for all of the metrics increasing from \$8.72 million to \$10.12 million and RG&E's total NRAs would increase from \$5.90 million to \$6.80 million.

²¹ Cases 19-E-0378, et al., supra, Order Approving Electric and Gas Rate Plans in Accord with Joint Proposal, with Modifications (issued November 19, 2020), Attachment 1 (Joint Proposal), Appendix P.

²² Cases 19-E-0378, et al., supra, Order Approving Electric and Gas Rate Plans in Accord with Joint Proposal, with Modifications (issued November 19, 2020), Attachment 1 (Joint Proposal), Appendix P.

²³ Cases 19-E-0378, et al., supra, NYSEG and RGE CS Performance Metric Waiver Letter (filed January 28, 2022); Cases 19-E-0378, et al., supra, Revised NYSEG and RGE Customer Service Metrics Waiver Petition (filed February 7, 2023).

Table 6 – 2022 Estimated Bill Results

Central Hudson was required to provide quarterly reports documenting the results of its scheduled meter reads, bill estimates, and complaints regarding billing throughout calendar year 2022.²⁴ Upon reviewing the granular data provided in these reports, Staff found that field service representatives were not inputting complete reasons for failing to read a customer’s meter or missing an appointment. This is a breakdown in procedures and Staff recommends that Central Hudson field personnel document the legitimate reason for every missed meter read and missed appointment, rather than leaving blank fields in Central Hudson’s system (**Staff Recommendation No. 9**).

Liberty SLG implemented a new program, Customer First, through which it is upgrading and replacing essential computer systems that are outdated to better serve its customers. Staff recommends the Company increase its effort to gain traction with customers in communicating digitally through email communications and electronic bill paying (**Staff Recommendation No. 13**).

NFG does not have NRAs or PRAs associated with its customer service performance metrics. In calendar year 2022, the utility had an estimated bill rate of 14.30%, which is an improvement from the Company’s 2021 performance of 16.60%. However, NFG’s performance ranks it as one of the worst utility performers for obtaining actual reads in calendar year 2022. During Staff’s site visit, utility personnel attributed the declines in actual meter

²⁴ Case 21-M-0045, Central Hudson Gas and Electric Corporation – Heating and Non-Heating Procedures Used to Calculate Bill Estimates, Order Approving Revised Bill Estimation Methods (issued August 16, 2021), p. 13.

readings and increases in estimated bills to several factors, including the assertion that many meters were indoors, and customers were not providing access to read the meters. The Company states that it has no plans to implement AMR or AMI within its service territory. Further, the Company states that almost three-quarters of its meters are inside, and due to the extreme weather in the service territory, especially during winter months, obtaining meter readings is challenging. The Company is currently conducting a campaign to move indoor meters outside, which will likely improve its performance for this metric in future years.

Appointments Kept and Missed Appointment Credits

When a utility agrees to an appointment with a customer, the utility has the responsibility to show up at a designated location, date, and time to perform functions. If the utility fails to arrive at the appointment within the designated window, it is considered a missed appointment. The utilities' tariffs require them to provide customers with a bill credit, ranging between \$20 and \$50, for these missed appointments. Table 7 details the number of credits issued for missed appointments in 2022 and the respective dollar amounts for the issued credits.²⁵

Table 7 – 2022 Missed Appointment Credits by Utility

Company Name	Credits Issued	Value of Credits Issued
KEDNY	3,228	\$112,080
KEDLI	638	\$29,100
NMPC	722	\$26,220
O&R	130	\$3,250
NYSEG	45	\$1,575
Con Edison	17	\$850
RG&E	20	\$700
Central Hudson	3	\$60
Corning	1	\$30

During Staff's site visit, KEDLI, KEDNY, and NMPC explained that they had uncovered a computer system error in how Kept Appointments were calculated within their

²⁵ The utilities listed in the table provide missed appointment credits. Liberty SLG, Liberty Water, Veolia, and NFG do not provide such credits.

systems in 2022. According to the Companies, the computer systems were identifying missed appointments for customers when there was not a missed appointment. The Companies stated they will not retract the missed appointment credits that may have been provided to customers erroneously in calendar year 2022 and the Companies are working internally to rectify the issue in 2023. Table 7 depicts all missed appointment credits issued to customers in 2022, including the missed appointment credits that may have been issued in error by KEDLI, KEDNY, and NMPC because they have not determined the number of credits issued in error.

Outage Notification Incentive Mechanism

Con Edison continues to report on its Outage Notification Incentive Mechanism, as required by its rate plan.²⁶ This mechanism requires the utility to provide communications to customers, the public, and other external interested parties during electric service outage events. Should Con Edison fail to adequately conduct outreach to the designated recipients, potential NRAs may be incurred. No event triggered activation of this mechanism in calendar year 2022 and, as a result, the utility did not incur an NRA.

Residential Collections Mechanisms

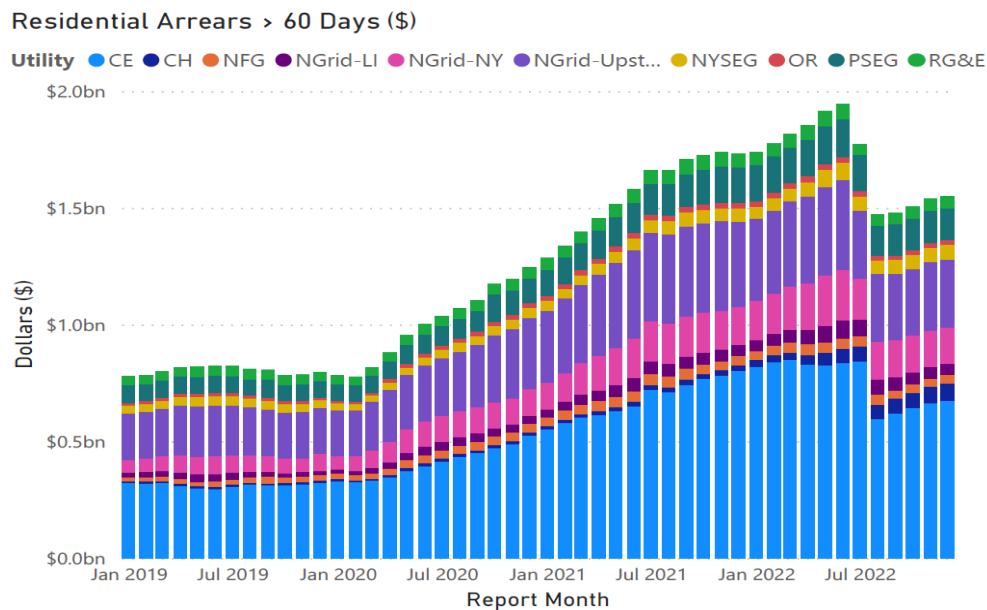
The Residential Collections Mechanism establishes two or three performance targets around: residential customer service terminations, residential customer uncollectibles, and/or residential customer arrearages. Should a utility's residential customer terminations, arrearages, and/or uncollectibles be lower than a specified target established in its rate plan, the company would be eligible to earn a PRA. Some utilities, such as NMPC and O&R, may incur an NRA if the utility's residential customer terminations, arrearages, and/or uncollectibles increase beyond specified targets. Many utilities have paused the Residential Collections Mechanisms within their respective rate plans, as a result of the Covid-19 Pandemic and the 2020 Moratorium on Terminations. One utility that has not paused the metric in 2022, was Liberty SLG, but the utility

²⁶ Cases 19-E-0065, et al., supra, Order Adopting Terms of Joint Proposal and Establishing Electric and Gas Rate Plan., (issued January 16, 2020), Attachment A (Joint Proposal) Appendix 18, pp. 5.

stated in its annual report that it would forgo the PRA that it achieved, as it has in previous years due to the effect the Covid-19 Pandemic had on its performance.²⁷

The utilities have procedures for issuing final termination notices to customers, and to disconnect customers, if customers do not make required payments to the utility. During the period prior to termination, the dollar amounts owed by customers are classified as arrears. Arrears are not written-off as uncollectible expense until a termination is completed. As shown in Table 8, utility arrears were significant in 2022 as a result of the Covid-19 pandemic. The Phase 1 arrears reduction program in the Energy Affordability Proceeding (EAP Arrears Phase 1) reduced the levels of arrears, as seen in July and August 2022, depicted in Table 8.²⁸

Table 8 – 2019-2022 Residential Customer Arrearages



During Staff's site visit to Liberty SLG, Staff observed a lack of outreach material in the walk-in areas, where customers may speak directly with a customer service representative. To streamline customer inquiries and address questions, the Company should make outreach materials, including information about deferred payment agreements and payment assistance programs,

²⁷ Cases 18-G-0133, St. Lawrence Gas Company, Inc. – Gas Rates, Customer Service Quality Performance Mechanism Results for the Period Ending December 31, 2022 (filed March 1, 2023), p. 3.

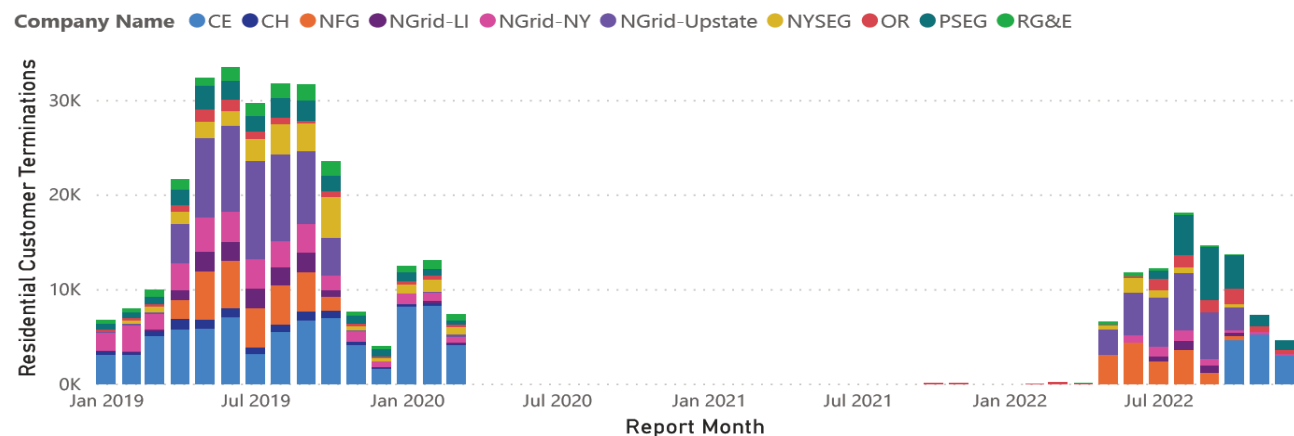
²⁸ Case 14-M-0565, Energy Affordability for Low Income Utility Customers, Order Authorizing Phase 1 Arrears Reduction Program, (issued June 16, 2022).

available in its walk-in office since they have hundreds of walk-ins per month, on average (**Staff Recommendation 12**).

While the utilities did conduct terminations in 2022, the utilities state these typically were accounts where there is no one at the premises/vacant locations, wrong addresses, prior account-holders who moved and did not pay their bill, or customers who had large arrears and were not in communication with the Company. The number of terminations since 2019 is detailed in Table 10, below.

Table 8 – 2019 - 2022 Residential Customer Terminations

Residential Customer Terminations by Report Month and Company Name



PSEG LI

Prior to 2022, the Amended and Reinstated Operations Services Agreement between LIPA and PSEG LI the process by which LIPA and PSEG LI set certain metrics to measure PSEG LI's performance against established goals for both residential and non-residential customers. For 2022, under the terms of the Second Amended and Restated Operations Services Agreement, LIPA and PSEG LI negotiate the metric targets and any changes on an annual basis pursuant to review and recommendation by DPS.²⁹

Metrics for residential customers include, but are not limited to, the JD Power Customer Satisfaction Survey (Residential and Business), Billing Cancelled Rebill, First Call Resolution, Arrearages Greater than 90 Days, Low to Moderate Income Program Participation, and

²⁹ Second Amended and Restated Operations and Services Agreement Between the Long Island Power Authority and PSEG Long Island, LLC, Appendix 4.3(C)(I)(B) (effective April 1, 2022). <https://www.lipower.org/wp-content/uploads/2022/04/2nd-AR-OSA-in-effect-on-4-1-2022-1.pdf>

Customer Complaint Rate. In 2022, PSEG LI's customer services scorecard reported that the Company did not expect to meet the targets for the JD Power Customer Satisfaction Survey (Residential or Business), First Call Resolution, Arrearages Greater than 90 days, or the Low to Moderate Income Program Participation. PSEG LI continues to report the uncollectibles and arrearages metric, despite the impact the Covid-19 pandemic and the Moratorium on Terminations has had on its performance.

2022 CUSTOMER SERVICE PERFORMANCE UTILITY AUDIT IMPROVEMENTS

During the audit process, Staff discovered a few areas for improvement in utility processes and reporting practices. Staff has identified a number of these improvements throughout the preceding sections of this report and others are discussed below in addition to improvements initiated by the companies.

Monthly CSPI Reports

Staff provided recommendations in the 2021 Report for the utilities to provide consistent reports that detail year-to-date monthly information. While, some utilities adhered to this recommendation, many did not. The CSPI Order did not explicitly state a format that the utilities were to submit their information to the Secretary to the Commission. Therefore, some utilities provide their CSPI reports in Adobe PDF, while others submit them in Microsoft Excel format, or both. Staff is working on a modified Microsoft Excel template and recommends all utilities who currently report monthly, once the template is completed, submit their CSPI report using the template so that stakeholders have data in a more user-friendly format (**Staff Recommendation 2**).

Webchat/Chatbot Functions

Some utilities, such as Central Hudson and Con Edison, have implemented webchat and/or chatbot functions onto their webpages. These features can assist customers with a variety of issues, such as making payments, making start/move/stop service requests, creating a deferred payment agreement, and viewing e-bills. Webchat features allow for the chatbots to address the customers' issues, while reducing customer call wait times. If the chatbot is unable to resolve the

customer's concern, the program notifies a CSR to interact with the customer in the chat to assist through the webchat functions.

The webchat feature has begun to address simple customer inquiries and concerns at some of the utilities. This self-service option for customers avoids placing calls to the utility and potentially enduring lengthy hold times, which also frees up CSRs to be able address more complex customers' calls. Several utilities, such as KEDLI, KEDNY, NMPC, NFG, O&R, NYSEG, and RG&E have not implemented webchat and/or chatbot functions. Staff recommends that utilities investigate the costs associated with implementing chatbots/webchat features and whether these would be beneficial options for their respective websites (**Staff Recommendation No. 4**).

Utility Personnel and Staffing Issues

Several utilities reported decreases in personnel throughout 2021 and into 2022. NYSEG and RG&E had the most significant declines in personnel, which they assert contributed to them failing their metrics in calendar year 2022. During this year's audit, Staff asked what all of the utilities, not just NYSEG and RG&E, were doing to improve attrition levels and to encourage their personnel to maintain employment with their companies. The majority of utilities noted that they were allowing personnel to telecommute a specified percentage of their work hours, though the percentages varied from utility to utility. Additionally, some utilities did not permit employees to telecommute for the first 12-36 months of employment, whereas other utilities allowed employees to telecommute full-time upon hiring. In order to train new personnel, some utilities required their employees to come into their offices for a minimum amount of time to complete training. Once completed, those utilities allowed the employees to start telecommuting.

Some utilities have worked to improve the office space itself to encourage its employees to stay with the company. For example, Con Edison has a designated quiet room where the CSRs can relax on breaks which the Company believes could encourage morale and improve their CSRs' perception of the utility. Overall, the utilities are working to lessen the levels of attrition that have increased in recent years and Staff is encouraged by the steps the utilities are taking to improve their relations with their personnel. Staff recommends that, to the extent they have not done so already, the utilities explore the use of telecommuting opportunities for customer service personnel to aid in the hiring and retention of employees (**Staff Recommendation No. 6**).

Customer Satisfaction Surveys

Customer Satisfaction Surveys consist of a multitude of questions, developed by each utility, which reflect macro-measures of customer service performance and attempt to capture all facets of the utility's operations. A majority of the utilities survey customers on a transactional basis and, typically, request that a customer complete a survey after a recent interaction between the customer and company.

Customers may contact the utilities through a variety of methods, including via telephone, email, webchats, text messages, mail, and in person. However, the utilities conduct a majority of the Customer Satisfaction Surveys by a single method, which varies based on the utility – either telephonically, by mail, or email. This leaves a gap in customer populations that the utilities do not reach for surveys. In order to reach the most customers and expand the demographics of customers participating in the Customer Satisfaction Survey, Staff recommends the utilities propose to incorporate both telephonic and electronic methods of conducting the Customer Satisfaction Survey in their next rate cases (**Staff Recommendation No. 5**).

Internal Audit and Manual Updates

The utilities have updated their metric manuals and procedures to reflect the modern computer systems that they have implemented in recent years. Staff finds the changes that the utilities made to their respective metrics manuals and the utilities' processes and procedures to be appropriate, as they reflect the companies' current business practices. Staff encourages the utilities to continue to review their metrics manuals, processes, and procedures to identify areas for improvement. Below, Staff describes the updates the utilities made to their metrics manuals, processes, and procedures during 2022 and the review of performance during that year.

Central Hudson conducted an audit of its procedural manual and determined that it required updates to align with the reporting from the new customer billing system. As discussed above, during this audit, Central Hudson found that the system was initially producing a compliance report counting each account adjustment as an adjusted bill rather than counting each bill sent to the customer. Central Hudson made a correction and filed revised reports.

As part of its submitted interrogatory responses, Con Edison detailed that it conducted an internal audit of its processes and procedures in 2022 and determined that it needed to revise its the annual and monthly CSPI procedure manuals. According to the Company, the

information it updated included clarifying data for point-of-time reporting, updating Call Answer Rate formulas, how the Company generates and retains the documents for the monthly and annual CSPI reports, and details on the completing of Contractor Evaluating Reports. Staff finds these changes appropriate and reflective of the Company's current processes.

KEDLI, KEDNY, and NMPC, informed Staff in their IRs, that the Companies had also conducted a review of their processes and procedures and discovered an error in their Appointments Kept tracking methodology in calendar year 2022. The Companies informed Staff that their computer system had been erroneously flagging customers as having a missed appointment. When the Companies audited its missed appointments, they confirmed the system error. The Companies stated they would not rebill customers for the missed appointment credits and that their IT department had resolved the error. Staff noted that the Companies had submitted an updated metrics manual after the Companies identified the appointments issue. Staff compared both the old and new versions of the manual to confirm the change in procedure.

NYSEG and RG&E added process language to the complaint and Terminations, Uncollectibles, and Arrearages section of their metrics manual. The Companies also updated their Adjusted Bill, Call Answer Rate, and Estimated Bill procedures to reflect changes stemming from newly implemented IT systems.

CONCLUSION

As discussed within this report, several of the electric, gas, and water utilities' performances on measures of customer service performance in calendar year 2022 were satisfactory. For Con Edison, Central Hudson, NMPC, NYSEG, RG&E, and Liberty SLG, the performance measures in place may not offer a strong enough incentive to maintain customer service performance. Several of these utilities acknowledged their efforts to correct the issues that led to declines in customer service throughout calendar year 2022 and their steps to improve performance in 2023. However, Staff will explore strengthening the metrics and adding additional protections to improve customers service performance. For the utilities that satisfactorily met their 2022 customer service performance metrics, the Commission's performance measures serve as a strong incentive to maintain performance and encourage the utilities to put significant efforts into maintaining customer service. Staff will continue to monitor customer service quality and

promote performance-based ratemaking strategies relating to customer service quality in conformance with Commission policies for all New York State utilities.

Appendix A: 2021 Customer Service Performance
Report Recommendations

- Staff Recommendations for all Utilities
 1. The utilities still using dollar values should include a proposal to shift incentive dollars to pre-tax basis points in their next rate case filing.
 2. The utilities propose the addition of an arrearages metric, associated targets, and PRA/NRA amounts in their next rate filing in conjunction with the Residential Terminations and Uncollectible Expenses metrics.
 3. The utilities, if not already filing in this manner, modify the CSPI reports to show data for the full current year to-date and to include the year-to-date totals at the end of the columns.
 4. All utilities conduct an analysis of various third-party vendors every five years to ensure the utilities are utilizing a fairly priced third-party vendor that will survey customers in accordance with the reporting requirements of each utilities' joint proposal and Case 15-M-0566.
 5. The utilities should conduct an analysis to determine whether its current staffing levels are appropriate prior to the resumption of residential service terminations.
- Staff Recommendations for Central Hudson
 6. Central Hudson improve its procedures regarding knowledge transfer to new employees, so that customer service employees at all levels, from new hires to management positions, are well-informed of how customer service performance data is calculated and the requirements of the Public Service Commission.
 7. Central Hudson develop procedures and conditions to write-off customer arrears over \$5,000 to avoid employee subjectivity and errors if the utility's new SAP CIS cannot perform this process automatically.
- Staff Recommendation for Con Edison
 8. Con Edison should conduct an analysis of conducting its customer satisfaction survey results on a monthly basis.
- Staff Recommendation for National Fuel Gas
 9. National Fuel Gas closely monitor and conduct regular analysis on the trends for estimated meter readings month to month and year over year to mitigate this performance from declining significantly, as normal operations begin to resume.
- Staff Recommendation for Liberty Water
 10. Liberty Water consider instituting a missed appointment credit guarantee in order to further goodwill with its customers.

- Staff Recommendation for Suez
 11. Suez investigate conducting the customer satisfaction surveys on a monthly basis.
- Staff Recommendations for Liberty SLG
 12. Liberty SLG develop outreach materials and procedures directing customers to alternative sources to address customer concerns in the event of any future extended office closures occur, to mitigate negative satisfaction reviews.
 13. Liberty SLG develop increased outreach and educational materials to ensure that customers have accurate and real time expectations of any upcoming computer system changes.

Appendix B: 2022 Customer Service Performance
Report Recommendations

- Staff Recommendations for all Utilities
 1. To remain consistent across all utilities and to ensure that the NRA and PRA values provide a meaningful incentive over time, utilities using dollar values should shift their incentive dollars to basis points in their next rate case filings.
 2. Staff is working on an excel template and, once the template is completed, recommends all utilities enter the CSPI report data into the modified excel template and submit the completed report each month moving forward.
 3. Rate plans should include a section that details the calculation methodologies for each of the annual Customer Service Performance Indicator metrics and the utilities should update their metric manuals accordingly.
 4. Utilities should investigate the costs associated with the implementation of chatbots/webchat features and whether these would be a beneficial option for their respective websites.
 5. Utilities should propose to incorporate both telephonic and electronic methods of conducting the Customer Satisfaction Survey within their next rate cases.
 6. Consider expanding telecommuting opportunities for customer service personnel to aid hiring and retention.
 7. To improve issuing bills based on actual meter readings, Companies should increase their efforts to educate customers on how to provide their own reads.
 8. If not already done, the utilities should commence tracking the speed of representatives answering customer calls, customer hold times, and abandoned customers calls for specific periods of call times, such as less than thirty seconds, less than one minute, greater than one minute, greater than two minutes, greater than five minutes, greater than ten minutes, greater than fifteen minutes, etc., for the potential implementation of future call monitoring metrics.
- Staff Recommendations for Central Hudson
 9. Central Hudson field personnel, at every appointment, should document the legitimate reasons for missed appointments rather than leaving fields in their system blank.
 10. Central Hudson should monitor staffing levels to ensure it assigns appropriate and adequate personnel to address call answer rate performance levels.
- Staff Recommendations for Con Edison
 11. Con Edison should monitor staffing levels to ensure it assigns appropriate and adequate personnel to address call answer rate performance levels.

- Staff Recommendations for Liberty SLG
 12. Liberty SLG should make outreach materials, including information about deferred payment agreements and payment assistance programs, available in its walk-in office since they have hundreds of walk-ins per month, on average.
 13. With the implementation of Customer First and its enhanced capabilities compared to the prior system, Liberty SLG should increase its efforts to gain more traction with customers in communicating digitally through email communications and electronic bill paying.
 14. Liberty SLG should closely monitor the transition to the new survey vendor to ensure that the requested level of survey responses are being completed and stay in close communication with the new vendor to proactively ensure that the transition to the new vendor is a success. Liberty SLG should continue reaching out to customers who provide an unsatisfactory survey response.
- Staff Recommendations for National Fuel Gas
 15. NFG should monitor its performance for Call Answer Rate and, if the Company commences changes to its systems, conduct an analysis on its available customer service representatives to ensure adequate staffing.
- Staff Recommendations for NYSEG/RG&E
 16. NYSEG and RG&E should monitor their staffing levels to ensure personnel are assigned to appropriately and adequately address call answer rate performance levels.
 17. NYSEG and RG&E should closely monitor and manage their staffing levels to ensure personnel are assigned to appropriately and adequately address customer service performance levels.
- Staff Recommendations for Veolia
 18. Veolia investigate implementing its survey on a monthly basis in its next rate case proceeding, so as to prevent lags in feedback from customers on their satisfaction level.

2022 Customer Service Performance Indicators											
	PSC Complaint Rate / Complaints	Customer Satisfaction Survey	CSS - Emergency Calls (Electric only)	CSS - Non- Emergency Callers	CSS - Emergency Calls (Gas only)	CSS - Service Center Visitors	Call Answer Rate	Adjusted Bills	Estimated Bills	ONIM	Residential Collections Mechanism
Central Hudson	X	X					X				X
Con Edison	X		X	X	X	X	X			X	X
Corning	X	X									X
KEDLI	X	X					X	X			X
KEDNY	X	X					X	X			X
National Fuel Gas	Not Applicable										
National Grid	X	X					X				X
NYSEG	X	X					X		X		X
Liberty NYAW	X										
Orange and Rockland	X	X					X				X
RG&E	X	X					X		X		X
Liberty SLG	X	X									X
Veolia f/k/a Suez	X	X									

Legend: X = Failed 2022 NRA Mechanism, X = Met 2022 NRA Mechanism, X = Not Applicable/Forgone Mechanism in 2022.